PHASE 1 RFI/RI REPORT
WALNUT CREEK PRIORITY DRAINAGE
OPERABLE UNIT # 6
VOLUME 3 (September, 1995)

Review Comments
George H Setlock (Kaiser-Hill Env Protection)
December 4, 1995

o Figure 3 3-1 (Why are we using 1993 RFETS wind rose ? Need to use 1994 wind rose - available in Site's CY1994 Annual Environmental Report see S Nesta (K-H) for copy of report) [Also see meteorological data comment on page two]

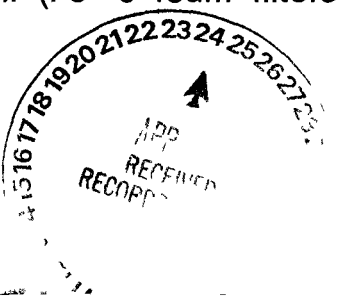
o Note Cs-137 not C_s-137 (OU 6 List of Acronyms and Abbreviations, p 1v)

o Section 5 2 3 1 (Volatile Organic Compounds), p 5-16
20,000 mg/l methylene chloride solubility, suggest using RFETS COCs versus contaminant with laboratory contamination contribution like methylene chloride

o Section 5 2 3 5 (Radionuclides), p 5-20
need to add *adsorption* to listing of physical & chemical properties that influence the mobility and behavior of radionuclides in environmental media [see section 5 2 4 2]

o Section 5 2 3 5 (Radionuclides), p 5-21
need to add *thorium* to discussion, it is a key component of RFETS alpha balance, also tritium would be worthwhile including since it has had a historical association with nitrate waters in the OU-6 area

o Section 5 2 4 2 (Mobility and Behaviour of Radionuclides & Metals), p 5-26, misleading since COC radionuclides should also be detected in filtered samples as well (i e 0 45um filters will not remove colloids)



1/2

ADMIN RECORD

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Page Two - G H Setlock

o Sections 5 3 1, 5 3 2, 5 3 3, 5 3 4 (Areas of Concern 1-4) need to be re-evaluated and have their COCs characterized more intuitively for the reader

o Section 5 5 (Surface Water Flow and Contaminant Transport Modeling), p 5-42, suggest stating that HSPF is EPA model that is a consensus model [if it isn't suggest adopting USGS model that is regarded as such], what attributes of HSPF lead it to be selected over other available models ? Has HSPF been used at other RFETS OUs ?

o Section 5 5 2 1 (Meteorological Data and Other Hydrologic Inputs), p 5-47, I question the use of Fort Collins meteorological data as being representative for RFETS - especially when supplemental data is available from Jefferson County Airport, and 13 PROFS network sites more proximate to the site

o Section 5 5 3 1 (Water Quantity Calibration), p 5-53, needs to cite and/ or incorporate USGS RFETS Water Balance for 1993 & 1994

o Section 6 4 1 (Current and Future Land Use), p 6-14, needs to reflect RFETS Vision and ASAP scenario

o Section 6 9 2 (Radiation Protection Standards), p 6-36, suggest referencing [or being consistent with] 40 CFR 196 and EPA/NRC 15 mrem standard

o Section 6 10 (Uncertainties and Limitations), p 6-38, suggest adding section on HSPF modeling uncertainties/assumptions (and Fort Collins meteorological data sensitivity analysis)

o Section 6 11 2 (Conclusions), p 6-45, as previously discussed, suggest referencing 40 CFR 196 here (i e 10(-4) risk for DOE/DOD sites across U S

2/2